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ATTORNEYS FOR DEFENDANTS

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**IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF UTAH**  
**CENTRAL DIVISION**

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JOSHUA CHATWIN,  
Plaintiff,  
v.

DRAPER CITY; OFFICER J. PATTERSON,  
in his individual and official capacity;  
OFFICER DAVID HARRIS, in his individual  
and official capacity; OFFICER HEATHER  
BAUGH, in her individual and official  
capacity; and JOHN DOES 1-10,

Defendants.

**DEFENDANTS' RULE 26(a)(2)(B)  
DISCLOSURE OF EXPERT REBUTTAL  
WITNESSES AND REPORTS**

Civil No. 2:14-cv-00375  
Judge Dale A. Kimball  
Magistrate Judge Pead

Pursuant to Rule 26(a)(2)(B) of the Federal Rules of Civil Procedure, Defendants' Draper City, Joshua Patterson, David Harris and Heather Baugh, (collectively "Defendants") by and through their undersigned counsel, hereby disclose the following experts who may be give rebuttal testimony at trial. Defendants also disclose a copy of the referenced experts' rebuttal reports.

## **REBUTTAL EXPERT WITNESSES WHO MAY TESTIFY AT TRIAL**

1. Kenneth R. Wallentine  
5272 South College Drive, Suite 200  
Murray, Utah 84123

Mr. Wallentine should be contacted through Defendants' counsel. Mr. Wallentine was hired by Defendants to evaluate, and prepare rebuttal reports to, Kirk Torgensen's expert report, dated January 12, 2016 and Trevor Petersen's expert report also dated January 12, 2016. Mr. Wallentine's opinions are included in his March 30, 2016 rebuttal expert reports, which are both signed by him and are attached to this disclosure as Exhibits A and B. Mr. Wallentine is expected to testify as to the opinions contained within said reports. Mr. Wallentine's reports include facts considered, curriculum vitae, history of publications and testimony, and his fee schedule.

2. Dr. Alan J. Goldman, M.D.  
5872 South 900 East, Suite 250  
Salt Lake City, Utah 84121

Dr. Goldman should be contacted through Defendants' counsel. Dr. Goldman was hired by Defendants to evaluate, and prepare rebuttal reports to Dr. Walter Reichert's expert report dated January 12, 1016. Dr. Goldman's opinions are included in his signed rebuttal expert report, which is attached to this disclosure as Exhibit C. Dr. Goldman is expected to testify as to the opinions contained within his report. Dr. Goldman's report includes the facts he considered in preparing his report and the history of his publications and testimony and his curriculum vitae, are attached to his report in addition to his fee schedule.

There may be other expert witnesses that Defendants may use to support their claims and defenses, which are unknown to Defendants at this time. Defendants reserve the right to identify

and disclose any additional expert witness(es) as necessary. Also, to the extent that Plaintiff's anticipated rebuttal disclosures change Defendants' experts' disclosures in any way, Defendants reserve the right to modify their Rule 26(a)(2)(B) disclosures accordingly, including the remittance of counter reports, as required.

Furthermore, as discovery is ongoing, should Defendants learn additional facts relevant to expert disclosures, these disclosures will be supplemented according to Fed. R. Civ. P. 26(e).

DATED this 30<sup>th</sup> day of March, 2016.

**DURHAM JONES & PINEGAR, P.C.**

/s/ Ashley M. Gregson

R. Blake Hamilton  
Ashley M. Gregson  
ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the forgoing was served this 30<sup>th</sup> day of March, 2016, via electronic filing, upon the following:

Lisa A. Marcy  
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/s/ Sarah Peck